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10	UNITED STATES	DISTRICT COURT
11	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
12		Case No. 4:20-cv-03664-YGR-SVK
13	CHASOM BROWN, <i>et al.</i> , individually and on behalf of all similarly situated,	[PROPOSED] ORDER GRANTING
14	Plaintiffs,	MOTION TO SEAL
15	V.	Judge: Hon. Susan van Keulen, USMJ
16	GOOGLE LLC,	
17	Defendant.	
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		Case No. 4:20-cv-03664-YGR-SVK
- 1	1	[PROPOSED] ORDER GRANTING MOTION TO SEAL

## [PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal Portions of Google's Reply in Support of Its Response to the Court's October 27, 2022 Order to Show Cause ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

<b>Document Sought To Be</b>	Court's Ruling on	Reason(s) for Court's Ruling
Sealed	Motion to Seal	
Google LLC's Reply in	GRANTED as to the	The information requested to be sealed
<b>Support of Its Response</b>	portions at:	contains Google's highly confidential and
to the Court's October		proprietary information regarding highly
27, 2022 Order to Show	Pages i:8, 1:20, 1:22,	sensitive features of Google's internal
<b>Cause (Dkt. 784)</b>	2:1, 4:7–8, 4:14–15,	systems and operations, including various
	4:17–19, 5:7, 5:15,	internal projects, internal data sources and
	5:17, 5:19–20, 5:28,	logs, and their proprietary functionalities,
	6:6, 6:12, 6:14, 6:16,	that Google maintains as confidential in the
	6:21, 6:24, 7:20, 8:8,	ordinary course of its business and is not
	8:13, 9:7, 9:11, 9:13,	generally known to the public or Google's
	9:16, 11:6, 11:8,	competitors. Such confidential and
	11:10–11, 11:18–19,	proprietary information reveals Google's
	12:1–3, 12:13,	internal strategies, system designs, and
	12:22–23, 13:18,	business practices for operating and
	13:21, 14:2, 14:6,	maintaining many of its important services,
	16:12, 17:26, 19:2,	and falls within the protected scope of the
	19:6, 19:8, 19:12,	Protective Order entered in this action. See
	19:18, 20:7	Dkt. 81 at 2–3. Public disclosure of such
		confidential and proprietary information
		could affect Google's competitive standing
		as competitors may alter their systems and
		practices relating to competing products. It
		may also place Google at an increased risk
		of cybersecurity threats, as third parties
		may seek to use the information to
		compromise Google's internal practices
		relating to competing products.
Ellis Declaration	GRANTED as to the	The information requested to be sealed
	portions at:	contains Google's highly confidential and
		proprietary information regarding highly
	Pages 2:3, 2:13, 3:1,	sensitive features of Google's internal
	3:3, 3:6–9, 3:12–18,	systems and operations, including various
	3:22–23, 3:27, 4:1,	internal projects, source code, and internal
	4:28	data sources, that Google maintains as
		confidential in the ordinary course of its
		business and is not generally known to the
		public or Google's competitors. Such

Ellia Evhibita A D	CDANTED as to the	confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Ellis Exhibits A-D	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
	portions at.	proprietary information regarding highly
	Seal Entirely	sensitive features of Google's internal
		systems and operations, including various internal projects, internal data sources and
		source code, that Google maintains as
		confidential in the ordinary course of its
		business and is not generally known to the
		public or Google's competitors. Such confidential and proprietary information
		reveals Google's internal strategies, system
		designs, and business practices for
		operating and maintaining many of its important services, and falls within the
		protected scope of the Protective Order
		entered in this action. See Dkt. 81 at 2–3.
		Public disclosure of such confidential and proprietary information could affect
		Google's competitive standing as
		competitors may alter their systems and
		practices relating to competing products. It
		may also place Google at an increased risk of cybersecurity threats, as third parties
		may seek to use the information to
		compromise Google's internal practices
Dannia Dadaya 4'	CDANTED and 41	relating to competing products.
<b>Psounis Declaration</b>	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
	Portions at.	proprietary information regarding highly
		sensitive features of Google's internal

1		Pages i:16–17, i:23,	systems and operations, including various
ر		i:28, ii:2–3, 2:18–19,	internal projects, internal data sources and
2		3:25-27, 4:4, 4:10,	logs, and their proprietary functionalities,
3		4:12-13, 10:13–14,	that Google maintains as confidential in the
		10:19, 10:22, 11:6,	ordinary course of its business and is not
4		13:7–8, 16:4–5, 16:10, 16:12, 16:25,	generally known to the public or Google's competitors. Such confidential and
5		23:2, 23:8–9, 23:13,	proprietary information reveals Google's
		23:15–16, 23:22,	internal strategies, system designs, and
6		23:28, 24:8, 24:11,	business practices for operating and
7		24:19, 24:24, 24:28–	maintaining many of its important services,
<i>'</i>		25:1, 25:5–7, 25:13,	and falls within the protected scope of the
8		25:21–24, 26:1,	Protective Order entered in this action. See
		26:7, 26:9, 26:21–	Dkt. 81 at 2–3. Public disclosure of such
9		24, 27:6	confidential and proprietary information
10			could affect Google's competitive standing as competitors may alter their systems and
,			practices relating to competing products. It
11			may also place Google at an increased risk
12			of cybersecurity threats, as third parties
.			may seek to use the information to
13			compromise Google's internal practices
14		CD ANTED 1	relating to competing products.
	Spilly Declaration	GRANTED as to the	The information requested to be sealed
15		portions at:	contains Google's highly confidential and proprietary information regarding highly
16		Pages 2:26–3:1,	sensitive features of Google's internal
		4:10, 4:12–16, 4:18,	systems and operations, including various
17		5:2, 5:9–10, 5:12,	internal projects, internal data sources, and
18		7:6, 7:18–19	source code, that Google maintains as
10			confidential in the ordinary course of its
19			business and is not generally known to the
20			public or Google's competitors. Such
20			confidential and proprietary information reveals Google's internal strategies, system
21			designs, and business practices for
22			operating and maintaining many of its
			important services, and falls within the
23			protected scope of the Protective Order
24			entered in this action. See Dkt. 81 at 2–3.
24			Public disclosure of such confidential and proprietary information could affect
25			Google's competitive standing as
26			competitors may alter their systems and
26			practices relating to competing products. It
27			may also place Google at an increased risk
			of cybersecurity threats, as third parties
28			may seek to use the information to

1			compromise Google's internal practices relating to competing products.
2	Spilly Decl. Exhibit 1	GRANTED as to the	The information requested to be sealed
3	Email chain re: Google's	portions at:	contains Google's highly confidential and
4	Response to Order to Show Cause	Pages 4–6, 11, 13	proprietary information regarding highly sensitive features of Google's internal
5			systems and operations, including various internal projects, internal data sources and
6			logs, and source code, that Google maintains as confidential in the ordinary
7			course of its business and is not generally known to the public or Google's
8			competitors. Such confidential and
9			proprietary information reveals Google's internal strategies, system designs, and
10			business practices for operating and maintaining many of its important services,
11			and falls within the protected scope of the
12			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such
13			confidential and proprietary information could affect Google's competitive standing
14			as competitors may alter their systems and
15			practices relating to competing products. It may also place Google at an increased risk
16			of cybersecurity threats, as third parties may seek to use the information to
17			compromise Google's internal practices
	Spilly Decl. Exhibit 2	GRANTED as to the	relating to competing products.  The information requested to be sealed
18	Email chain re: Brown v.	portions at:	contains Google's highly confidential and
19	Google – Source Code	Pages 4–7	proprietary information regarding highly sensitive features of Google's internal
20			systems and operations, including various internal projects, internal data sources and
21			logs, and source code, that Google
22			maintains as confidential in the ordinary course of its business and is not generally
23			known to the public or Google's competitors. Such confidential and
24			proprietary information reveals Google's
25			internal strategies, system designs, and business practices for operating and
26			maintaining many of its important services, and falls within the protected scope of the
27			Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such
28			confidential and proprietary information

1			could affect Google's competitive standing
2			as competitors may alter their systems and
_			practices relating to competing products. It
3			may also place Google at an increased risk of cybersecurity threats, as third parties
4			may seek to use the information to
7			compromise Google's internal practices
5			relating to competing products.
6	Spilly Decl. Exhibit 3	GRANTED as to the	The information requested to be sealed
	Supplemental Declaration	portions at:	contains Google's highly confidential and
7	of Eugene Lee	Pages 1:12, 1:14,	proprietary information regarding highly sensitive features of Google's internal
8		1:17–18, 1:20–24,	systems and operations, including various
		1:26–28, 2:1-6, 2:8,	internal projects, internal data sources and
9		2:10–17, PDF Pages	logs, and their proprietary functionalities,
10		4–18	that Google maintains as confidential in the
			ordinary course of its business and is not
11			generally known to the public or Google's competitors. Such confidential and
12			proprietary information reveals Google's
			internal strategies, system designs, and
13			business practices for operating and
14			maintaining many of its important services,
			and falls within the protected scope of the Protective Order entered in this action. <i>See</i>
15			Dkt. 81 at 2–3. Public disclosure of such
16			confidential and proprietary information
17			could affect Google's competitive standing
1 /			as competitors may alter their systems and
18			practices relating to competing products. It may also place Google at an increased risk
19			of cybersecurity threats, as third parties
19			may seek to use the information to
20			compromise Google's internal practices
21		CDANTED 4 41	relating to competing products.
	Spilly Decl. Exhibit 4 GOOG-CABR-00058527	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
22	GOOG CABR 00030327	portions at.	proprietary information regarding highly
23		Seal Entirely	sensitive features of Google's internal
			systems and operations, including various
24			internal projects and strategies, internal
25			data sources and logs, and their proprietary functionalities, that Google maintains as
26			confidential in the ordinary course of its
26			business and is not generally known to the
27			public or Google's competitors. Such
28			confidential and proprietary information
40			reveals Google's internal strategies, system

Spilly Decl. Exhibit 5 GOOG-CABR-04131930	GRANTED as to the portions at: Seal Entirely	designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.  The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects and strategies, internal data sources and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as
		entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties
Smilly Dool Ewhibit (	GRANTED as to the	may seek to use the information to compromise Google's internal practices relating to competing products.
Spilly Decl. Exhibit 6 GOOG-BRWN-00029182	portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly

1			internal projects, internal data sources and
2			logs, and their proprietary functionalities,
2			that Google maintains as confidential in the
3			ordinary course of its business and is not generally known to the public or Google's
4			competitors. Such confidential and
4			proprietary information reveals Google's
5			internal strategies, system designs, and
			business practices for operating and
6			maintaining many of its important services,
7			and falls within the protected scope of the
			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such
8			confidential and proprietary information
9			could affect Google's competitive standing
10			as competitors may alter their systems and
10			practices relating to competing products. It
11			may also place Google at an increased risk
10			of cybersecurity threats, as third parties
12			may seek to use the information to compromise Google's internal practices
13			relating to competing products.
14	Spilly Decl. Exhibit 7	GRANTED as to the	The information requested to be sealed
14	GOOG-CABR-04118195	portions at:	contains Google's highly confidential and
15		~ 15 . 1	proprietary information regarding highly
1.6		Seal Entirely	sensitive features of Google's internal
16			systems and operations, including various internal projects and strategies, internal
17			data sources and logs, and their proprietary
10			functionalities, that Google maintains as
18			confidential in the ordinary course of its
19			business and is not generally known to the
20			public or Google's competitors. Such
20			confidential and proprietary information reveals Google's internal strategies, system
21			designs, and business practices for
22			operating and maintaining many of its
22			important services, and falls within the
23			protected scope of the Protective Order
24			entered in this action. See Dkt. 81 at 2–3.
24			Public disclosure of such confidential and proprietary information could affect
25			Google's competitive standing as
26			competitors may alter their systems and
20			practices relating to competing products. It
27			may also place Google at an increased risk
28			of cybersecurity threats, as third parties
40	l 1	1	may seek to use the information to

1			compromise Google's internal practices relating to competing products.
2	Spilly Decl. Exhibit 8	GRANTED as to the	The information requested to be sealed
3	GOOG-BRWN-00428101	portions at:	contains Google's highly confidential and
		Seal Entirely	proprietary information regarding highly sensitive features of Google's internal
4		Sear Entirely	systems and operations, including various
5			internal projects and strategies, that Google maintains as confidential in the ordinary
6			course of its business and is not generally
7			known to the public or Google's competitors. Such confidential and
8			proprietary information reveals Google's internal strategies, system designs, and
9			business practices for operating and
10			maintaining many of its important services, and falls within the protected scope of the
11			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such
12			confidential and proprietary information
13			could affect Google's competitive standing as competitors may alter their systems and
14			practices relating to competing products. It may also place Google at an increased risk
15			of cybersecurity threats, as third parties
16			may seek to use the information to compromise Google's internal practices
			relating to competing products.
17	Spilly Decl. Exhibit 10	GRANTED as to the	The information requested to be sealed
18	Plaintiffs' RFPs to Google, Set 6	portions at:	contains Google's highly confidential and proprietary information regarding highly
19	Google, Set o	Pages 10:12, 10:15,	sensitive features of Google's internal
20		11:20, 11:22–23, 16:9	systems and operations, including various internal projects and metrics, that Google
21			maintains as confidential in the ordinary course of its business and is not generally
22			known to the public or Google's
23			competitors. Such confidential and proprietary information reveals Google's
24			internal strategies, system designs, and
			business practices for operating and maintaining many of its important services,
25			and falls within the protected scope of the Protective Order entered in this action. <i>See</i>
26			Dkt. 81 at 2–3. Public disclosure of such
27			confidential and proprietary information could affect Google's competitive standing
28			as competitors may alter their systems and

1			practices relating to competing products. It
2			may also place Google at an increased risk of cybersecurity threats, as third parties
3			may seek to use the information to compromise Google's internal practices
4	G W D 1 D 101 44	CD 13 IEEE 1	relating to competing products.
5	Spilly Decl. Exhibit 11 Berntson Exhibit 13 -	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
	Berntson Fact Sheet	portions at.	proprietary information regarding highly
6		Pages 3–12	sensitive features of Google's internal
7			systems and operations, including various internal projects, internal identifiers,
8			internal data sources, and their proprietary functionalities, that Google maintains as
9			confidential in the ordinary course of its business and is not generally known to the
10			public or Google's competitors. Such
11			confidential and proprietary information reveals Google's internal strategies, system
12			designs, and business practices for
13			operating and maintaining many of its important services, and falls within the
14			protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3.
15			Public disclosure of such confidential and
16			proprietary information could affect Google's competitive standing as
17			competitors may alter their systems and practices relating to competing products. It
18			may also place Google at an increased risk
19			of cybersecurity threats, as third parties may seek to use the information to
19			compromise Google's internal practices
20			relating to competing products.
21			
22	SO ORDERED.		
23	DATED:		
24	DITIED.	HO	ON. SUSAN VAN KEULEN
25		Uì	NITED STATES MAGISTRATE JUDGE
26			
27			
28			
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		9	Case No. 4:20-cv-03664-YGR-SVK